UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

EDNA DELGADO,)
)
Plaintiff,)
)
v.)
) Removed from 15 L 007711
TARGET CORPORATION,)
) Jury Demanded
Defendant.)

NOTICE OF REMOVAL

TARGET CORPORATION, the Defendant in the above entitled cause, seeks removal from the Circuit Court of Cook County and to the United States District Court, Northern District of Illinois, Eastern Division and, in support thereof, allege as follows:

- 1. This action was commenced against TARGET CORPORATION, in the Circuit Court of Cook County, Illinois on July 29, 2015. A copy of Plaintiff's Complaint was served upon Defendant TARGET CORPORATION on July 31, 2015.
- 2. At the time the action was commenced and since then, upon information and belief, the Plaintiff was and is a citizen of the County of Cook, State of Illinois and Defendant, TARGET CORPORATION, was and is a corporation organized and existing under the laws of the State of Minnesota with its principal place of business in Minneapolis, Minnesota.
- 3. The amount in controversy exceeds \$75,000.00 exclusive of interest and costs, as appears from Plaintiff's Complaint. (A copy of which is attached hereto and incorporated herein by reference in this Notice as Exhibit "A"). Plaintiff, EDNA DELGADO, allegedly sustained personal injury, pain and suffering, disfigurement and disability, and incurred medical bills, lost wages, and continues to incur these damages allegedly due to a slip and fall on the premises. Upon information and belief, Plaintiff has accrued \$58,472.59 in medical bills. Further, Plaintiff demanded \$100,000.00 in February 2015.

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4. This action is a civil one of which the United States District Courts have original

jurisdiction under 28 USC §1332.

5. The Defendant TARGET CORPORATION attaches to this notice copies of all process,

pleadings, and orders that have been served on it. (A copy of which are attached hereto and incorporated

by reference in this Notice as Exhibit "B").

WHEREFORE, the Defendant, TARGET CORPORATION, prays that this cause be removed to

the United States District Court for the Northern District of Illinois.

BRYCE DOWNEY & LENKOV LLC

TARGET CORPORATION,

By: s:/Christopher M. Puckelwartz

One of Defendant's Attorneys

Rich Lenkov, #6231079 Christopher M. Puckelwartz, #6243690 BRYCE DOWNEY & LENKOV LLC 200 North LaSalle Street, Suite 2700

Chicago, IL 60601

Phone: 312-377-1501 Fax: 312-377-1502

rlenkov@bdlfirm.com

cpuckelwartz@bdlfirm.com

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STATE OF ILLINOIS)	
)	SS
COUNTY OF COOK)	

Christopher M. Puckelwartz, being first duly sworn on oath, deposes and says that:

- 1. He is one of the attorneys for the Defendant in this cause;
- 2. He has prepared and read the notice of removal filed in this cause and has personal knowledge of the facts and matters contained in it; and
- 3. The facts and allegations contained in the notice of removal are true and correct.

BRYCE DOWNEY & LENKOV LLC

TARGET CORPORATION,

By: <u>s:/Christopher M. Puckelwartz</u> One of Defendant's Attorneys

Rich Lenkov, #6231079 Christopher M. Puckelwartz, #6243690 BRYCE DOWNEY & LENKOV LLC 200 North LaSalle Street, Suite 2700 Chicago, IL 60601

Phone: 312-377-1501 Fax: 312-377-1502 rlenkov@bdlfirm.com cpuckelwartz@bdlfirm.com